

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Curtis Eugene Ellison

Case: 2:23-mj-30069
Assigned To : Unassigned
Assign. Date : 2/15/2023
CMP: USA v ELLISON (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 13, 2023 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in possession of a firearm

21 U.S.C. § 841(a)(1) &(b)(1)(A)

Possession with intent to distribute a controlled
substance

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 15, 2023

City and state: Detroit, MI

john alverson

Complainant's signature

John D Alverson II Task Force Officer, FBI

Printed name and title

Elizabeth A. Stafford

Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Task Force Officer John D. Alverson II, being duly sworn, hereby depose and state as follows:

1. I am a Detective Trooper of the Michigan State Police and have been employed with the Michigan State Police for approximately seven years. In addition, I have been assigned to the Federal Bureau of Investigation (FBI) Macomb County Violent Crime Task Force as a Task Force Officer since November 2022. During my time as a Detective Trooper and a Task Force Officer, I have conducted many violent crime investigations, including investigations into violations of drug and firearm laws.

2. The facts in this affidavit come from my personal observations and knowledge, my training and experience, and information obtained from other officers, agents, and other persons who have knowledge of the events described herein. This affidavit is merely intended to show that there is probable cause that Curtis Eugene Ellison committed federal firearms and narcotics violations, it does not set forth all my knowledge about this matter.

3. On Monday, February 13, 2023, I, together with and detectives and

officers from Michigan State Police drug task force unit executed a search warrant at a house on 38XXX Cedarbrook Ct., Farmington Hills, Oakland County, Michigan. The investigation that led to the search warrant also identified Curtis Eugene Ellison as the resident of that address.

4. During the execution of the warrant and search of the residence, law enforcement located and recovered the following items, among others:
 - a. Approximately two grams of suspected crack cocaine;
 - b. Approximately three thousand two hundred and sixty-nine grams of suspected fentanyl;
 - c. Approximately six hundred and sixty-six grams of suspected cocaine;
 - d. Approximately twenty-five in a half dosage unit of suspected MDMA;
 - e. One digital scale;
 - f. One mechanical drug press;
 - g. One blender next to suspected two bottles of “benefiber” a suspected cutting agent;
 - h. Food saver bags, razor blades and a vacuum sealer;
 - i. One Glock semi-automatic handgun, .45 caliber, model 30S, with

serial number XLH364, loaded with one magazine containing ten rounds .45 caliber cartridges;

- j. One Glock, 10mm caliber, semi-automatic rifle, model 20, with serial number VBC100, loaded with one magazine containing fourteen rounds of 10mm cartridges;
 - k. One Glock model 19 handgun, with serial number BAVF902, loaded with one magazine containing fifteen 9mm cartridges;
 - l. One FN, 5.7MM caliber, model Five Seven handgun, serial number 386300428, loaded with one magazine and twenty-one 5.7x28 caliber cartridges;
 - m. One Smith and Wesson Model MP40 .40Cal handgun, Serial number HSF9629, loaded with one magazine and fifteen .40 caliber cartridges.
 - n. One Springfield Model XD10 10MM handgun, Serial number BA249957, loaded with one magazine and fifteen 10MM cartridges.
 - o. One Zastava Yugoslavia and Serbia, Model Zastava Serbia pistol 7.62 cal. Serial number M92PV062128, leaded with one magazine and thirty rounds of 7.62 cartridges.
5. During the execution of the search warrant at Cedarbrook Ct

Farmington Hills, Michigan, Ellison was found inside the residence along with his girlfriend Amber Rea Wells.

6. After the residence was secure and both Ellison and Wells were searched and secured.

7. Ellison advised interviewing officer that he did not know anything was inside the house.

8. The firearms identified above at letters J,M, and K, were later confirmed to have been reported as stolen out of various jurisdictions.

9. Field tests conducted on the seized controlled substances listed in paragraph 5 above returned positive results for the controlled substances cocaine and fentanyl.

10. During the execution of the search warrant, law enforcement seized approximately \$190,000 from a safe located inside of the residence.

11. A review of ELLISON'S criminal history revealed that he has the

following felony convictions:

Michigan

- a. 02/1990, felony for controlled substance-del/mfg less than fifty grams;
- b. 02/1990, felony for controlled substance-possession, less than twenty-five grams;
- c. 02/2001, felony for del/mfg marijuana and money laundering, charged through DEA Detroit.

11. Based upon Affiant's training and experience, the Smith and Wesson handgun with serial number HSF9629, the Glock 20 handgun with serial number VBC100, and the Glock 19 handgun with serial number BAVF902, were not manufactured in the state of Michigan and, therefore, it previously affected interstate commerce.

12. Based upon the facts set forth in this affidavit, there is probable cause to believe that Curtis Ellison, a previously convicted felon, possessed the Smith and Wesson handgun with serial number HSF9629, the Glock 20 handgun with serial number VBC100, and the Glock 19 handgun with serial number BAVF902 in violation of Title 18, United States Code Section 922(g)(1). Further, based upon the crack cocaine, powdered cocaine, fentanyl, MDMA, mechanical drug press, "benefiber" containing suspected narcotics cutting agent, food saver bags, vacuum

sealer, razor blade and scale found in Ellison's residence, there is probable cause to believe that Curtis Ellison possessed the controlled substances identified above with the intent to distribute them to others in violation of Title 21, United States Code Section 841(a)(1) &(b)(1)(A)

john alverson
John D Alverson II
Task Force Officer, FBI

Sworn to before me and signed in my presence
And/or by reliable electronic means

Elizabeth A. Stafford
Hon. Elizabeth A. Stafford
United States Magistrate Judge

Date: February 15, 2023